IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARGARET PALCKO

: CIVIL ACTION : NO: 02-2990

Plaintiff,

:

AIRBORNE EXPRESS, INC.

v.

Defendant. : JURY TRIAL DEMANDED

Motion of Defendant Airborne Express to Dismiss Plaintiff s Complaint

Defendant Airborne Express ("Airborne") respectfully moves the Court pursuant to Fed.R.Civ.P. 12(b)(2) and (5) to dismiss plaintiff's complaint for insufficiency of service of process and lack of personal jurisdiction. The facts and the law in support of this Motion are set forth in the accompanying Memorandum of Law.

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Dated: October 2, 2002